

From: Rob Globus [REDACTED]
To: <jkarkoski@waterboards.ca.gov>, <AWLaputz@waterboards.ca.gov>
CC: 'PNSSNS Subwatershed Group' <cleanwaters@netscape.com>
Date: 3/23/2011 7:08 AM
Subject: Submission of individual farm information to public-accessed databases

Dear Mr. Laputz and Mr. Karkoski

The PNSSNS Subwatershed Group has brought to my attention the proposed regulation which will require all farmers/ranchers to electronically submit their farm information directly to the Reg. Wtr. Bd.

My name is Rob Globus and I am a pear farmer and member of the Placer-Nevada-South Sutter- North Sacramento Subwatershed Group (PNSSNS, one of ten subwatersheds under the Sacramento Valley Water Quality Coalition SVWQC). I am concerned with the "planned electronic submittals from individual dischargers to the Board" (pageA-14, #6 of the Framework document).

For 7 years, our 600 ranchers and farmers have spent \$300,000 on agriculture water monitoring to comply with the current ILRP. For 7 years, our waters have tested clean. For 7 years, we have proven that we are a low threat watershed.

Now you are asking each individual farmer to electronically submit our farm information directly to you, bypassing PNSSNS which was originally formed to keep costs low and to allow farmers and ranchers some control of our regulatory destiny. This absurd proposal will undermine our years of effort to comply with the ILRP via the local coalition and its outreach and education to our members and local agencies. Your proposal will alienate the PNSSNS coalition leadership from our membership. Certainly, this requirement will ratchet up regulatory creep on our low-threat complying members. In low-threat areas like PNSSNS, there is no justification for this level of increased regulatory action.

Public accessed electronic databases containing individual farm information and maps will subject us to potential security issues and data abuse/misuse. There is no protection against other interested stakeholders forcing the Regional Board's hand to use this as a regulatory compliance tool. Without a doubt, the Regional Board will spend far more on an electronic data gathering system than it is worth.

Complying with this requirement is an impossibility for roughly half our members. 30% of our members do not have internet access and don't own a computer. Another 20% are using dial-up or some other inconvenient means to access the internet such as driving their laptop to town to a "free wi-fi" establishment. I am fortunate; I have computer skills as I worked off the farm for many years. I can tell you that most of my neighbors who are a bit older than myself can't operate computers and will never learn.

Finally; please consider the implications of adding one more requirement and chore for people to do. Does anyone in government ever consider how much time it takes for people to comply with all the forms and filings that a farmer has to fill out or hire someone to fill out? I bet you both have staff and secretaries who do the majority of your paperwork. Try slogging thru the field all day before you come in to do the paperwork your job requires. It might change your perspective a bit. Why do you think we have a coalition to do this.

Please do not require electronic submittal of individual farm information.

Thank you.

Rob Globus